

**UNITED STATES BANKRUPTCY COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

<b>IN RE:</b>	§	
	§	
<b>LEGENDARY FIELD EXHIBITIONS, LLC,</b>	§	
	§	<b>CASE NO. 19-50900-CAG</b>
	§	<b>CHAPTER 7</b>
	§	
<b>Debtor.</b>	§	
	§	
<b>DUNDON CAPITAL PARTNERS LLC,</b>	§	
	§	
<b>Plaintiff,</b>	§	
	§	<b>ADV. NO. 22-05077</b>
<b>v.</b>	§	
	§	<b>Judge: Craig A. Gargotta</b>
<b>CHARLES EBERSOL,</b>	§	
	§	
<b>Defendant.</b>	§	

**STIPULATION TO EXTEND DISCLOSURE DEADLINE**

1. Dundon Capital Partners, LLC (“DCP”) filed this suit on November 14, 2022 at 3:44 p.m. (“05077”).
2. About 1 hour and 20 minutes later, at 5:05 p.m., Randolph N. Osherow filed Adversary Proceeding No. 22-05078, styled *Osherow v. Thomas Dundon, et al.* (“05078”).
3. Adversary Proceedings 05077 and 05078 are related; the Trustee’s suit alleges that DCP and others breached promises and duties related to funding and operating the AAF and this 05077 alleges that Ebersol made misrepresentations to DCP about the AAF’s debts and funding requirements.
4. Since the filing of 05077 and 05078, the parties in both cases have actively discussed consolidating the cases for pretrial proceedings and possibly for trial under a single

consistent case management order. The parties to 05077 are in agreement to consolidation of the cases and to entry of a single consistent case management order.

5. On March 30 the Court issued a Scheduling Order setting deadlines for, among other things, filing initial disclosures, amending and supplementing pleadings, and discovery.

6. In anticipation that a consolidated case management order will be entered in 05077 and 05078 DCP and Defendant Charles Ebersol STIPULATE to extend the deadline for serving initial disclosures until May 30, 2023, or at such time the Court designates as part of the new consolidated matter.

Respectfully submitted,

THOMPSON, COE, COUSINS & IRONS, L.L.P.

By: /s/ William N. Radford

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**CERTIFICATE OF SERVICE**

The undersigned counsel of record hereby certifies that on April 13, 2023, true and correct copies of the foregoing document were served electronically via the Court's CM/ECF system to all those entitled to receive service in this adversary proceeding and to all counsel of record via email, as follows:

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